#### STEVE LOVE for Congress

32<sup>nd</sup> Congressional District of Taxas
3920 Sloopy La. Dallas, TX

March 13, 2008

Office of the General Counsel Federal Election Commission 999 E Street, N W Washington, DC 20463

MUR # 5983

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

1000 MAR 18 A 11

Dear Sir

The following is the listing of eleven (11) instances in which I believe the FEC rulegibave from violated by Mr. Eric Nelson Roberson, candidate for the nomination of the Democratic Party for the 32<sup>nd</sup> Congressional District of Texas. The alleged offenses include the following

- Failure to report funds received and keep accurate accounts as required by the FEC studelines.
- Musleading donors by having multiple exploratory committees and switching office sought.
- Failure to report in-kind contributions from his employer,
- Failure to declare candidacy once spending/funding and activity threshold was passed and
- Multiple violations of the testing-the-water guidelines

The following is the bill of particulars. In disregard to the FEC regulations governing exploratory efforts and declaration of candidacy, the following is alleged

- 1 Accepting donations under a "Senatorial Exploratory Committee", Mr. Roberson collected \$9,300 from donors in Utah and New Jersey during the period of January 12 to March 7, 2007, far exceeding funds needed to travel, phone and do polling in Texas as allowed to test-the-waters before committing to being a candidate (See Exhibits B, D)
- 2 Expended money under "Eric Roberson Senste Exploratory Committee" beginning January 26, 2007 in violation of the FEC rules that duallow multiple exploratory committees and deceptively suggesting a race for the Senste (See Exhibit E)
- 3 Put up "Eric Roberson for Congress" web site on or before February 8, 2007 in violation of the prohibition of "public political advertising" while testing-the-waters (See Exhibit J)
- 4 Jouned a candidate-endorsing organization May 2, 2007 in violation of testing-thewaters rules (See Exhibit E)
- 5 Donated \$2555 08 to another candidate's campaign in violation of testing-the-waters rules (See Exhibit F & G)
- 6 Bought beverages for another candidate in violation of testing-the-waters rules (See Exhibit K)

#### STEVE LOVE for Congress

32 Congressional District of Texas
3920 Slowny La. Dallas, TX

- 7. "Refunded \$2,555.00 donation" to another candidate without there being evidence of the other candidate having made the "prior donation", in violations of reporting of all funds collected or expended after declaration of candidacy (See Exhibit I)
- 8 Filed candidacy for Congressional office January 4, 2008 after twelve months of representing oneself as a Senatorial candidate, in violation of the spirit and intent of testing-the-waters guidelines and with the effect of deceiving donors (See Exhibit A)
- 9 Failure to file as a candidate immediately after February 8, 2007 when funding threshold and activities went far beyond polling, telephoning and traveling to test-thewaters. (See Exhibit A)
- 10 Use of an employer's office as a campaign headquarters constitutes an in-kind donation by Mr Mulligan or the Mulligan Law Firm, where Mr Roberson is an employee There is no report of such in-kind donation in violation of the reporting rules (See Exhibit C & H)
- 11. An exploratory period extending from January 12, 2007 to January 4, 2008 would seem to have morphed into a candidacy if the prohibition of "activities over a protracted period of time" apply (See Exhibit A)

Respectfully yours,

Signed and sworn to before me by the said STEPHEN L LOVE, this  $\frac{3^{46}}{100}$  day of

March, 2008, in Dellas County, Texas



Motary Public in and for Dallas County, Texas

# **EXHIBIT A**

# FEC FILING ANALYSIS OF ERIC ROBERSON FOR CONGRESS CAMPAIGN

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	~		(First) David Peterson, Kenese City	
	<b>~</b>		(Last) Robert Bientz, Austin (date?)	
	9		Last Desgnar Graphics	
			Total collected \$13,586.00	

# Opposition

- Line 15 Where is the report of the donation to ERSEC from M. Watts for which the \$2,666 00 is a "refund?"
  - 2 Do FEC regulations approve of multiple exploratory committees?
- Do FEC regulations consider as legitimate an exploratory committee for one office when the candidate ultimately runs for another?
  - Line 3 Did the content of the web site put up on or about 4/8/07 reflect exploration or candidacy?
- Line 10 -Do FEC expenditures of exploratory committees include a \$2,000 donation to the exploratory committee of enother candidate?
  - Line 11 & 15 Do FEC rules anticipate an expli committee of one person donating \$3,110 06 to the campaign of another candidate?
    - When wee AciBlue contracted with? (No date is indicated on report.)
- Line 8 Is enhancing web site with autho capacity consistent with exploration?
- Line 9 Is membership in Democratic candidate endorsament group consident with exploration?
  - 10 Line 5 is buying beverages for another candidate a legitimate exploratory expense?
- Line 12 Is having "support staff" to use as in-land donation to shother campagn an exploratory function?
  - 12 Line 13 What did the Quarum Report have to sell for \$297 69

## EXHIBIT 8 ROBERSON DONATION PATTERN

"Senstorial Exploratory Committee"

DATE	SOURCE	Occupation	STATE	AMT.	TOTALS
2/24/07 Mel	hew Driggs	Attorney	Utah	\$600	
3/7/07 Tro	Welker	Attorney	Utah	\$2,000	
2/5/07 Wes	ne Bramberger	Attorney	<b>Utah</b>	\$2,100	
2/5/07 Ted	Draper	Attorney	<b>Utah</b>	\$2,100	
2/15/07 Jees	e Ferrer	Attorney	<b>Delles</b>	\$1,000	
1/12/07 Serr	& Pat Morovitz	Attorney	New Jersey	\$250	
1/15/07 D &		Attorney	New Jersey	\$250	
2/6/07 Jam	es Boyd	Allomey	<b>Utah</b>	\$2,100	

\$10,300

"Eric Roberson for Congress Committee"

	A GOOD HOLD ON THE STATE OF		
1/29/06 David George	Attorney	Houston	\$250
2/8/08 Jesse Ferrer	Attorney	Dallas	\$1,300
2/8/08 Red Stewart	Attorney	Delles	\$60
1/14/08 Lynn Clark	Homemaker	Plano	\$1,000
1/18/08 Pet Muligen	Attorney	Dallas	\$2,300
1/21/08 Linda Camin	Retired	Dalles	\$26
1/24/08 Gner Raggio	Attorney	Dellas	\$250
1/27/08 Greg Roberson	Tech	Conroe	\$2,300
12/26/08 Robert Bientz	Attorney	Auetin	\$2,300
1/10/08 David Peterson		Kaneas City	\$2,300
1/13/08 Dale East		Dallas	\$1,300

TOTAL \_

\$23,000

#### **EXHIBIT C**

FEC MAIL CENTER

26 HH- 35

Bric Roberton for Congress Compage 4514 Cale Avenue, finite 300 Dellas, TX 75205 214-738-5884

Federal Election Commission 999 E Street, NW Washington, DC 20463

Door Sir or Medeane:

Harloard please find so-filed copies of my pro-primary disclosure from, originally sent via regular med, deposited and post-mediad Paistury 16, 2008.

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Hris Roberton

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# EXHIBIT D

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## **EXHIBIT F**

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#### EXHIBIT H



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#### ERIC N ROBERSON



Eine N. Reberson is an accounte in The bludgen Law Pinn in Dallas, Twee Mr Reberson's guivent practice fecuses on representing clients injured by Fen-Phon, Baycol, and consumer feud clien action bligation

For his first covern years of precises, Mr Roberson was a defence-cide employment literation and labor atterney with the Defenture firms of Haynes and Booms, P.C. and Hughes and Luce, P.C.

Prior to Jorning Putrick Muligents office, Mr. Roberson run the Trinity Legal Foundation, on organization dedicated to precenting practical office courses to impress, doctors and ministers across the nation, including Meetrys Publication conference attendance

Mr. Roberson received his B.A. and J.D., cum laude, from Baylor University. Prior to Law School, Mr. Roberson was a Navel Flight Officer, serving as a Bombarder-Havigator on A-6 Introders: A valuran of Operation Decent Sheetd, Mr. Roberson logged over 600 hours of jut flight time and 150 cerner landings.

(Not Cortilled by the Tunes Board of Legal Specialization )

The above is not legal advice. That can only come from a qualified alterney who is familiar with all the facts and circumstances of a particular, apeculto case and the relevant lew. Please note that you are not considered a client until you have signed a relevant agreement and your case has been accepted by us. See Terms of Use

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#### Mass Tort Litigation

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